

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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CENTURY INDEMNITY COMPANY, as successor  
to Insurance Company of North America; ACE  
PROPERTY & CASUALTY INSURANCE  
COMPANY (f/k/a CIGNA Property & Casualty  
Insurance Company), as successor-in-interest to  
Central National Insurance Company of Omaha, but  
only as respects policies issued by it through Cravens,  
Dargan & Company, Pacific Coast; and PACIFIC  
EMPLOYERS INSURANCE COMPANY,

Plaintiffs,

vs.

TRANSATLANTIC REINSURANCE COMPANY,

Defendant.

07 CV 10712 (VM)  
(ECF)

**MOTION TO ADMIT  
KIMBERLY M. HAMM  
PRO HAC VICE**

FILED  
U.S. DISTRICT COURT  
2008 FEB 20 AM 11:26  
S.D. OF N.Y.

PURSUANT TO RULE 1.3 (c) of the Local Rules of the United States District Courts for the  
Southern and Eastern District of New York, I, R. James DeRose, III, a member in good standing  
of the bar of this Court, hereby move for an Order allowing admission pro hac vice of

Kimberly M. Hamm  
Locke Lord Bissell & Liddell LLP  
111 South Wacker Drive  
Chicago, Illinois 60606  
Phone Number: (312) 443-0700  
Fax Number: (312) 443-0336

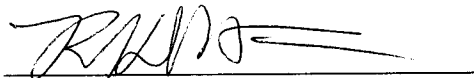
Kimberly M. Hamm is a member in good standing of the Bar of the State of Illinois.

There are no pending disciplinary proceedings against Ms. Hamm in any State or Federal Court.

642517 \$25  
80-02-2  
20

Dated: February 15, 2008  
State: New York, New York

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'RJD', is written over a horizontal line.

R. James DeRose, III (RD 9660)  
Locke Lord Bissell & Liddell LLP  
885 Third Avenue, 26th Floor  
New York, New York 10022  
Ph: (212) 812-8329  
Fax: (212) 812-8379

NYC 64556v.1

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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CENTURY INDEMNITY COMPANY, as successor  
to Insurance Company of North America; ACE  
PROPERTY & CASUALTY INSURANCE  
COMPANY (f/k/a CIGNA Property & Casualty  
Insurance Company), as successor-in-interest to  
Central National Insurance Company of Omaha, but  
only as respects policies issued by it through Cravens,  
Dargan & Company, Pacific Coast; and PACIFIC  
EMPLOYERS INSURANCE COMPANY,

Plaintiffs,

07 CV 10712 (VM)  
(ECF)

vs.

TRANSATLANTIC REINSURANCE COMPANY,

Defendant.

**AFFIDAVIT OF  
R. JAMES DEROSE III  
IN SUPPORT OF MOTION  
TO ADMIT KIMBERLY M.  
HAMM PRO HAC VICE**

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State of New York     )  
                                  ) ss.:  
County of New York    )

R. James DeRose, III, being duly sworn, hereby deposes and says:

1. I am an associate at Locke Lord Bissell & Liddell LLP, counsel for Defendant Transatlantic Reinsurance Company ("Transatlantic") in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendant's motion to admit Kimberly M. Hamm as counsel pro hac vice to represent Defendant in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law on June 7, 2004. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known Kimberly M. Hamm since 2003.
4. Ms. Hamm is a partner at Locke Lord Bissell & Liddell LLP in Chicago, Illinois.
5. I have found Ms. Hamm to be a skilled attorney and a person of integrity. She is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

6. Accordingly, I am pleased to move the admission of Kimberly M. Hamm, pro hac vice.
7. I respectfully submit a proposed order granting the admission of Kimberly M. Hamm, pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Kimberly M. Hamm, pro hac vice, to represent Plaintiff in the above captioned matter, be granted.

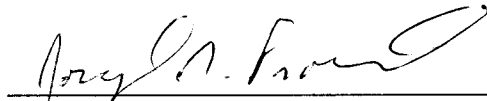
Dated: February 15, 2008  
State: New York, New York

Respectfully submitted,



R. James DeRose, III (RD 9660)

Sworn to before me this 15<sup>th</sup>  
day of February, 2008.

  
\_\_\_\_\_  
Notary Public

JOSEPH N. FROEHLICH  
Notary Public, State of New York  
No. 02FR6002500  
Qualified in Suffolk County  
Commission Expires February 9, 20 10  
NYC 64552v

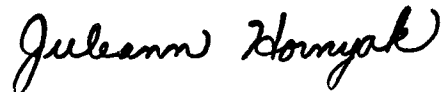
## **Certificate of Admission To the Bar of Illinois**

I, Juleann Hornyak, Clerk of the Supreme Court of Illinois, do hereby certify that

Kimberly Melanie Hamm

has been duly licensed and admitted to practice as an Attorney and Counselor of Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on November 7, 1996 and is in good standing, so far as the records of this office disclose.

In Witness Whereof, I have hereunto  
placed my hand and affixed the seal  
of said Supreme Court, at Springfield,  
in said State, this Tuesday, January 29, 2008.

A handwritten signature in black ink, reading "Juleann Hornyak". The signature is written in a cursive, flowing style.

Clerk

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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CENTURY INDEMNITY COMPANY, as successor  
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Central National Insurance Company of Omaha, but  
only as respects policies issued by it through Cravens,  
Dargan & Company, Pacific Coast; and PACIFIC  
EMPLOYERS INSURANCE COMPANY,

Plaintiffs,

07 CV 10712 (VM)  
(ECF)

vs.

TRANSATLANTIC REINSURANCE COMPANY,  
  
Defendant.

**ORDER FOR ADMISSION  
PRO HAC VICE ON  
WRITTEN MOTION**

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Upon the motion of R. James DeRose, III attorney for Defendant Transatlantic Reinsurance  
Company, and said sponsor attorney's affidavit in support;

**IT IS HEREBY ORDERED** that

Kimberly M. Hamm  
Locke Lord Bissell & Liddell LLP  
111 South Wacker Drive  
Chicago, Illinois 60606  
Phone Number: (312) 443-0700  
Fax Number: (312) 443-0336  
Email Address: khamm@lockelord.com

is admitted to practice pro hac vice as counsel for Defendant Transatlantic Reinsurance  
Company in the above captioned case in the United States District Court for the Southern  
District of New York. All attorneys appearing before this Court are subject to the Local Rules of  
this Court, including the Rules governing discipline of attorneys. If this action is assigned to the

Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated: February \_\_, 2008  
New York, New York

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United States District/Magistrate Judge

NYC 64557v.1

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

---

CENTURY INDEMNITY COMPANY, as successor to Insurance Company of North America; ACE PROPERTY & CASUALTY INSURANCE COMPANY (f/k/a CIGNA Property & Casualty Insurance Company), as successor-in-interest to Central National Insurance Company of Omaha, but only as respects policies issued by it through Cravens, Dargan & Company, Pacific Coast; and PACIFIC EMPLOYERS INSURANCE COMPANY,	:	
	:	
	:	<b>AFFIDAVIT OF KIMBERLY M. HAMM IN SUPPORT OF MOTION FOR ADMISSION <i>PRO HAC VICE</i></b>
	:	
Plaintiffs,	:	Civil Action No.: 07 CV 10712
	:	Judge Victor Marrero
vs.	:	
	:	
TRANSATLANTIC REINSURANCE COMPANY,	:	
	:	
Defendant.	:	

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STATE OF ILLINOIS	)	
	)	ss:
COUNTY OF COOK	)	

KIMBERLY M. HAMM, being duly sworn, deposes and states:

1. I am an associate in the law firm of Locke Lord Bissell & Liddell, LLP, counsel to Defendant Transatlantic Reinsurance Company ("Transatlantic") in this matter. I submit this affidavit in support of my application to this Court for an order permitting me to appear as counsel *pro hac vice* on behalf of Transatlantic for the purposes of this action.

2. This affidavit is submitted pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York in support of the instant application for admission *pro hac vice* to the Southern District Court of New York for the purpose of representing Transatlantic in the above-captioned matter.

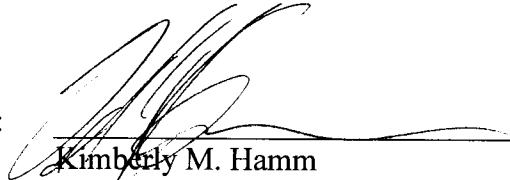


3. Locke Lord Bissell & Liddell, LLP has an attorney-client relationship with Transatlantic. Defendant requested that MARK A. KREGER, Esq. and I represent it in this matter.

4. I am a practicing attorney and member in good standing of the bar of the State of Illinois (attached is a certificate of good standing from the Supreme Court of Illinois). Moreover, there have never been any disciplinary proceedings or criminal charges filed against me in any jurisdiction.

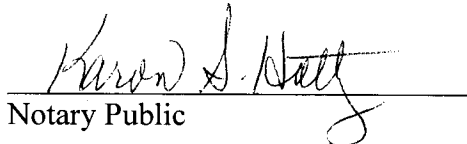
5. My office address, telephone number and facsimile number are included below my signature.

By:



Kimberly M. Hamm  
111 South Wacker Drive  
Chicago, IL 60606  
Telephone (312) 443-0700  
Facsimile (312) 443-0336

Sworn to before me this  
3<sup>rd</sup> day of Feb 2008

  
Notary Public

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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CENTURY INDEMNITY COMPANY, as successor  
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only as respects policies issued by it through Cravens,  
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EMPLOYERS INSURANCE COMPANY,

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07 CV 10712 (VM)  
(ECF)

vs.

TRANSATLANTIC REINSURANCE COMPANY,  
  
Defendant.

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**CERTIFICATE OF SERVICE**

STATE OF NEW YORK     )  
                                  SS.:  
COUNTY OF NEW YORK    )

I, Gerry M. O'Leary, being duly sworn, deposes and says:

I am not a party to the within action, I am over 18 years of age, and am a Paralegal for attorneys,  
LOCKE LORD BISSELL & LIDDELL LLP, attorneys for the Defendants in the above-  
captioned action.

I certify and declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that on February 19,  
2008, I served a copy of MOTION TO ADMIT KIMBERLY H. HAMM PRO HAC VICE,  
AFFIDAVIT OF R. JAMES DEROSE, III, IN SUPPORT OF MOTION TO ADMIT  
KIMBERLY H. HAMM PRO HAC VICE (which attaches [PROPOSED] ORDER FOR  
ADMISSION PRO HAC VICE ON WRITTEN MOTION) and AFFIDAVIT OF KIMBERLY  
H. HAMM IN SUPPORT OF MOTION FOR ADMISSION PRO HAC VICE upon:

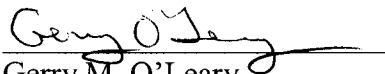
Frank Michael Esposito, Esq.  
Crowell & Moring LLP (New York)  
153 East 53rd Street, 31st Floor  
New York, NY 10022  
(212) 223-4000

Fax: (212) 223-4134  
Email: fesposito@crowell.com

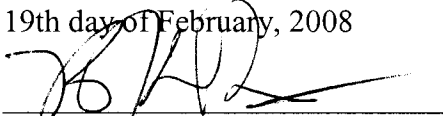
by personally handing the copy to a representative of said counsel, namely a Ms. Aeria, who was working as the 31st Floor receptionist.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York  
February 19, 2008

  
Gerry M. O'Leary  
Paralegal  
Locke Lord Bissell &  
Liddell LLP  
885 Third Avenue  
New York, New York 10022  
(212) 812-8330

SWORN TO BEFORE ME THIS  
19th day of February, 2008

  
R. James DeRose, III

**R. JAMES DE ROSE, III, ESQ.**  
Notary Public, State of New York  
No. 02DE6144289  
Qualified in Bronx County  
Commission Expires April 24, 2010